

## **VIA ECFS**

June 29, 2016

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of Secretary 445 12<sup>th</sup> Street, S. W. Washington, D.C. 20554

RE: Submission of information Pursuant to FCC 54.313 Rules and Request for Confidential Treatment – ETC Annual Reports and Certifications WC Docket Nos. 10-90 and 14-58

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Pioneer Communications, Inc. ("Pioneer"), Kansas, Study Area Code 411817, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 14-58. Pioneer, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan information identified on Form 100, Line 112 and (2) the financial annual report identified on Form 3005, both of which were redacted in the ECFS submission. The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 Protective Order in WC Docket Nos. 10-90 and 14-58. The financial reports contain competitively sensitive data that is not otherwise available from publically available sources. The request for confidential treatment of the five-year plan information is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). Pioneer keeps this information strictly confidential and it is subject to protection under the Freedom of Information Act (FOIA) and the Commission's implementing rules. Release of this information would have a substantial negative impact on the Company.

Pioneer is also transmitting the following information to the Commission in compliance with C.F.R. §§54.313 and 54.422:

 Submission to the Office of the Secretary, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection. Confidential information has been designated in accordance with Confidentiality guidelines and the Protective Order. The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

Pioneer requests that the information contained in its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Company keeps confidential. Public availability of this information would have a substantial negative impact on the Company. Pioneer offers the following information pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA in support of this request:

- (1) Identification of the specific information for which confidential treatment is sought:
  - Attachment to Line 112 of FCC Form 481 Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Company's future network plans and information concerning future services provided to customers.
- (2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:
  - The information was submitted in WC Docket Nos. 10-90 and 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).
- (3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:
  - The five-year service quality improvement plan and associated progress reports contain information on the Company's future plans, number of customers served and other planning information that company does not make publicly available.
- (4) Explanation of the degree to which the information concerns a service that is subject to competition:
  - Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more Internet service providers.
- (5) Explanation of how disclosure of the information could result in substantial competitive harm:
  - Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Company's strategic plans. This would provide competitors access to confidential information they could employ to develop their own plans a particular service area. This could cause competitive harm to the Company.

121 East College Street • Broken Arrow, OK 74012 • 918-298-1618

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Company has continually treated information regarding its network and service plans as confidential and carefully controls the information to protect it from competitors.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Company requests that the extracted information be withheld from public inspection indefinitely. The five year planning period information would provide valuable information to competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Please contact me if you have any questions.

Sincerely,

Jan Monney

Tim Morrissey President 314-605-9220

tmorrissey@fwainc.com

**Enclosures** 

FCC For	m 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name: Person USAC should contact with questions about this data	Catherine Moyer	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6203563211 ext.	
<039>	Contact Email Address: Email of the person identified in data line <030>	catherine.moyer@pioncomm.net	
	Form Type	54.313 and 54.422	

	ervice Quality Improvement Reporting ollection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0 July 2013	819
<010>	Study Area Code	411817			
<015>	Study Area Name	PIONEER TEL ASSI	INC		
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer			
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer	@pioncomm.net		
<110>	Has your company received its ETC certification from the FCC?  If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	(yes / n	·) O O		
<111>	year plan" filed with the FCC?	(yes / n	o) O O		
<112>	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your CETC which only receives frozen support, your progress report is only required to address voice telephony service.		1817KS112.pdf		
	Please select the appropriate responses below (Yes, No, Not Applicable) to cont that the attached document(s), on line 112, contains a progress report on its fix service quality improvement plan pursuant to §54.202(a). The information shall submitted at the wire center level or census block as appropriate.	ve-year		Name of Attached Document	
<113>	Maps detailing progress towards meeting plan targets		Yes	]	
<114>	Report how much universal service (USF) support was received		Yes	1	
<115>	How much (USF) was used to improve service quality and how support was used to impr	rove service quality	Yes	1	
<116>	How much (USF) was used to improve service coverage and how support was used to im	prove service coverage	Yes	1	
<117>	How much (USF) was used to improve service capacity and how support was used to imp		Yes	╡	
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	12	Not Applicable	j	

(200) Service Outage Reporting (Voice)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

Data Con	ection Form									2013	-0980/OIVIB CONTION	0. 3000-0819
<010>	Study Area Co	tudy Area Code 411817										
<015>	Study Area Na	ime				PIONEER TEL	ASSN INC					
<020>	Program Year					2017						
<030>				ct regarding this		Catherine M						
<035>				erson identified								
<039>	Contact Email	Address - Ema	il Address of pe	erson identified	l in data line <0	)30> catherine.m	moyer@pioncomm.net					
<210>	For the prior	calendar yea	ar, were there	e any reportal	ble voice serv	ice outages?	Yes			<u></u>		
<220>	<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
	NORS									Did This Outage		
	Reference Number	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of	911 Facilities Affected	Service Outage Description (Check	Affect Multiple Study Areas	Camilas Outana	Preventative
	Number	Date	Time	Date	Time	Customers Affected	Customers	(Yes / No)	all that apply)	(Yes / No)	Service Outage Resolution	Procedures
								(100)	ан анаструу	(100)		
							See attached	<b>!</b>				
							rksheet	4				
						WO	INSTIGET					

	fulfilled Service Request ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		
<010>	Study Area Code	411817			
<015>	Study Area Name	PIONEER TEL ASSN INC			
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer			
<035>	Contact Telephone Number - Number of person identified in data lin	e <030> 6203563211 ext.			
<039>	Contact Email Address - Email Address of person identified in data lin	e <030> catherine.moyer@pioncomm.net			
<300> U	infulfilled service request (voice)	0			
<310> D	Detail on attempts (voice)				
		Name of Attached Document			
<320> (	Unfulfilled service request (broadband)	0			
<330>	Detail on attempts (broadband)				
Name of Attached Document					

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should conta	ct regarding this data  Catherine Moyer
<035>	Contact Telephone Number - Number of p <030>	erson identified in data line 6203563211 ext.
<039>	Contact Email Address - Email Address of p <030>	person identified in data line catherine.moyer@pioncomm.net
<400>	Select from the drop-down list to indicate voice complaints (zero or greater) for voice calendar year for each service area in which any facilities you own, operate, lease, or or	telephony service in the prior Offered only fixed voice n you are designated an ETC for
<410>	Complaints per 1000 customers for fixed v	oice 0.0
<420>	Complaints per 1000 customers for mobile	voice
<430>	Select from the drop-down list to indicate end-user customer complaints (zero or greathe prior calendar year for each service are an ETC for any facilities you own, operate,	ater) for broadband service in Offered only fixed broadband a in which you are designated
<440>	Complaints per 1000 customers for fixed b	roadband 0.0
<450>	Complaints per 1000 customers for mobile	broadband

•	npliance With Service Quality Standards and Consumer Protection Rules lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	411817	
<015> <020>	Study Area Name Program Year	PIONEER TEL ASSN INC 2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035> <039>	Contact Telephone Number - Number of person identified in data line <030> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net	
<500>	Certify compliance with applicable service quality standards and consumer pro	otection rules Yes	
<510>	Descriptive document for Service Quality Standards & Consumer Protection Ru	411817KS510.pdf ules Compliance	

(600) Functionality in Emergency Situations  Data Collection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013
<010> Study Area Code	411817	
<015> Study Area Name	PIONEER TEL ASSN INC	
<020> Program Year	2017	
<030> Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035> Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net	
<600> Certify compliance regarding ability to function in emergency situations	Yes	
<610> Descriptive document for Functionality in Emergency Situations	411817KS610.pdf	

	ice Offerings including Voice Rate Data		FCC Form 481		
Data Co	llection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		
<010>	Study Area Code	411817			
<015>	Study Area Name	PIONEER TEL ASSN INC			
<020>	Program Year	2017			
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer			
<035>	Contact Telephone Number - Number of person identified in data I	ne <030> 6203563211 ext.			
<039>	Contact Email Address - Email Address of person identified in data	ine <030> catherine.moyer@pioncomm.net			
	Residential Local Service Charge Effective Date  1/1/2016 Single State-wide Residential Local Service Charge  18.5				

<703>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
	<b>a.</b> .	()	(2==2)		Residential Local			Mandatory Extended Area	
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	State Subscriber Line Charge	State Universal Service Fee	Service Charge	Total per line Rates and Fees
					0				
					See at	tached worksheet			

(710) Broadbrand Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
	July 2013

<010>	Study Area Code 4:	11817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c></c>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select }
-									
-									
ŀ				- See attac	ned				
•			,	worksheet -					
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-									
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(800) Operating Companies		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010> Study Area Code	411817	
<015> Study Area Name	PIONEER TEL ASSN INC	

2017

<020> Program Year

<030>	Contact Name - Person l	JSAC should contact regarding this data	Catherine Moyer
<035>	035> Contact Telephone Number - Number of person identified in data line <030>		6203563211 ext.
<039>	Contact Email Address -	Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net
<810>	Reporting Carrier	Pioneer Telephone Association, Inc.	
<811>	Holding Company	Pioneer Telephone Association, Inc.	
<812>	Operating Company	Pioneer Telephone Association, Inc.	

<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
!			
•	See atta	ached workshe	et
•			
•			
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•			
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(900) Tri	pal Lands Reporting		Form 481
Data Col	lection Form		3 Control No. 3060-0986/OMB Control No. 3060-0819
		July	2013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net	
<900>	Does the filing entity offer tribal land services? (Y/N)	No	
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation	Name of Attached Document	
If your o	ompany serves Tribal lands, please select (Yes,No, NA) for each these boxes		
-	rm the status described on the attached document(s), on line 920,		
	trates coordination with the Tribal government pursuant to	Select	
	B(a)(9) includes:	Yes or No or	
<921>	Needs assessment and deployment planning with a focus on Tribal	Not Applicable	
<922>	community anchor institutions. Feasibility and sustainability planning;		
<923> <924>	Marketing services in a culturally sensitive manner;		
	Compliance with Land Lice permitting requirements		
<925>	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
<928>	Compliance with Cultural Preservation review processes		
<929>	Compliance with Tribal Business and Licensing requirements.		

	oice and Broadband Service Rate Comparability lection Form		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013	
<010>	Study Area Code		411817	
<015>	Study Area Name		PIONEER TEL ASSN INC	
<020>	Program Year		2017	
<030>	Contact Name - Person USAC should contact regarding this data		Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <	<030>	6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line	<030>	catherine.moyer@pioncomm.net	
<1000>	Voice services rate comparability certification	Yes	s	
<1010>	Attach detailed description for voice services rate comparability compliance	4118	817KS1010.pdf	
			Name of Attached Document	
<1020>	Broadband comparability certification		s - Pricing is no more than the most recent applicable benchmark announced be Wireline Competition Bureau	ЭУ
<1030>	Attach detailed description for broadband comparability compliance			
			Name of Attached Document	

(1100) N	o Terrestrial Backhaul Reporting		FCC Form 481
Data Col	lection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net	
<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes	
<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 upstream within the supported area pursuant to § 54.313(g).	kbps	

Lifeline	erms and Condition for Lifeline Customers		FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Coll	ection Form		July 2013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <030	> 6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030	> catherine.moyer@pioncomm.net	
<1210>	Terms & Conditions of Voice Telephony Lifeline Plans		Name of Attached Document
		r	Name of Attached Document
<1220>	Link to Public Website HTTP	http://www.pioncomm.net/phone/	
or the we	heck these boxes below to confirm that the attached document(s), on line 1210, obsite listed, on line 1220, contains the required information pursuant to (a)(2) annual reporting for ETCs receiving low-income support, carriers must report:		
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,		
<1222>	Details on the number of minutes provided as part of the plan,		
<1223>	Additional charges for toll calls, and rates for each such plan.		

(2000) Price Ca	ap Carrier Additional Documentation		FCC Form	m 481
Data Collectio	n Form		ОМВ Со	ontrol No. 3060-0986/OMB Control No. 3060-0819
Including Rate	of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 201	3
	dy Area Code	411817 PIONEER TEL ASSN INC		
	dy Area Name gram Year	2017		
		Catherine Moyer		
	tact Telephone Number - Number of person identified in data line <030>	6203563211 ext.		_
	tact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net		
	ppropriate responses below (Yes, No, Not Applicable) to note ct America Phase II support as set forth in 47 CFR § 54.313(b),			
Inc	remental Connect America Phase I reporting			
<2010>	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note to 2016 certification, this applies to Round 2 recipients of Support			
<2011>	Support  3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note 1  2016 certification, this applies to Round 1 recipients o  Support			
<2022>	Recipient certifies, representing year two after filing a acceptance of funding pursuant to 54.312(c), that the question are not receiving support under the Broadba Program or the Broadband Technology Opportunities projects that will provide broadband with speeds of at Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients on	e locations in and Initiatives a Program for at least 4		
<2023>	The attachment on line 2024 includes a statement of capital funding expended in the previous year in meet America Phase I deployment obligations, accompanied blocks indicating where funding was spent. This cover 54.313(b)(2)(ii). Round 2 recipients only.	ting Connect ed by a list of census		
<2024A>	Round 2 Recipient of Incremental Support?			
<2024B>	Attach list of census blocks indicating where funding v two - 54.313(b)(2)(ii). Round 2 recipients only.	-	attached Document Listing nformation	
<2025A>	Round 1 or Round 2 Recipient of Incremental Support	t?		
-				
<2025B>	Attach geocoded Information for Phase I milestone re year three and Round 2 for year two) - Connect Ameri Docket 10-90, Report and Order, FCC 13-		ittached Document Listing nformation	
<2015>	2016 and future Frozen Support Certification 47 CFR §	§ 54.313(c)(4)		

Data Collection For	rrier Additional Documentation (Continued) m eturn Carriers affiliated with Price Cap Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<2016>	Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} Certification support used to build broadband	
	: America Phase II Reporting {47 CFR § 54.313(e)}	
<2017A>	Connect America Fund Phase II recipient?	
<2017B>	Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price	Name of Attached Document Listing Required Information
<2018>	cap carrier used for capital expenditures in 2015. Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(2)(ii)	Name of Attached Document Listing Required Information
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(2)(v)	
<2020>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)	
<2021>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - 54.313(e)(4)	
<2026>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5)	
<2027>	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)	

(3005) Rate Of Return Carrier Additional Documentation	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

Complete the items below to note compliance with five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

	Progress Report on 5 Year Plan			
(3009)	Carrier certifies to 54.313(f)(1)(iii)			
		Yes - Attach Ce	ertificatic:	on
(3010A)	Milestone Certification {47 CFR § 54.313(f)(1)(i)}		41	1817KS3010(b).pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Re Information	equired	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	Г	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Re Information	equired	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)		
(3014)	If yes, does your company file the RUS annual report	(Yes/No)		
	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)			
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		Γ	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Re Information	equired	
(3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:	(Yes/No)		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	L	<i>'</i>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	L	<i>V</i>	
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:		V	
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers			
(3023)	Underlying information subjected to a review by an independent certified public accountant			
(3024)	Underlying information subjected to an officer certification.	[		
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	[		411817ks3026.pdf
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Re Information		41101/KS3020.pu1

(3005) Rate Of Return Carrier Additional Documentation (Continued)	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net



# **REDACTED - FOR PUBLIC INSPECTION**

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data li	ne <030> 6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data li	ne <030> catherine.moyer@pioncomm.net

# 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

# Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001**. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

# Community Anchor Institutions – FCC 14-98 (paragraph 79)

**4003a**. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

## If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

if yes to 4005A, please provide a response for 4005B.		
<b>4003b</b> . Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
Broadband Deployment Locations – FCC 14-98 (para	agraph 80)	
<b>4004a</b> . Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
<b>4004b</b> . Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband	Name of Attached Document Listing Required Information	

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

#### Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: PIONEER TEL ASSN INC

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/28/2016

Printed name of Authorized Officer: Catherine Moyer

Title or position of Authorized Officer: CEO/General Manager

Telephone number of Authorized Officer: 6203563211 ext.

Study Area Code of Reporting Carrier: 411817 Filing Due Date for this form: 07/01/2016

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form			orm 481 Control No. 3060-0986/OMB Control No. 3060-0819 013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.ne	t

# TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) is authorized to submit the information reported on behalf of the reporting also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.		
Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:	Date:	
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
Persons willfully making false statements on this	an be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

# TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent	Authorized to File Annual Reports for CAF or LI Recipie	ents on Behalf of Reporting Carrier
	norized to submit the annual reports for universal service support reporting carrier; and, to the best of my knowledge, the informat	
Name of Reporting Carrier:		
Name of Authorized Agent Firm:		
Signature of Authorized Agent or Employee of Agent:		Date:
Name of Authorized Agent Employee:		
Title or position of Authorized Agent or Employee of Agen	t	
Telephone number of Authorized Agent or Employee of A	gent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
Persons willfully making false statements on this form	n can be punished by fine or forfeiture under the Communications Act of 18 of the United States Code, 18 U.S.C. § 1001.	1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title



•	vice Outage Reporting (Voice) ection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	411817	
<015>	Study Area Name	PIONEER TEL ASSN INC	
<020>	Program Year	2017	
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net	
<210> <220>	For the prior calendar year, were there any reportable voice service out	ages? Yes	

<a></a>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h>&gt;</h>
		102		12.11	1021		911		Did This Outage		
NORS		Outage		Outage	Number of	Total	Facilities	Service Outage	Affect Multiple		
Reference	Outage Star	t Start	Outage End		Customers	Number of	Affected	Description (Check	Study Areas	Service Outage	Preventative
Number	Date	Time	Date	Time	Affected		(Yes / No)	all that apply)	(Yes / No)	Resolution	Procedures
15-19738740	07/15/2015	18:13	07/15/2015	22:08	1130	1130	Yes	Wireline (including cable) VoIP, Wireline (including cable) Voice (non-VoIP), 911, E911 or NG911 Services only, Power outage from storm at Johnson central office.	No	A Tech was able to restore the generator, which restored power to the Johnson City CO & equipment.	Additional Maintenance and testing of central office backp power sources.

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

 <701> Residential Local Service Charge Effective Date
 1/1/2016

 <702> Single State-wide Residential Local Service Charge
 18.5

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
-	ALL EXCHANGES	SAC (CETC)	FR FR	18.5	0.0	1.56	0.0	20.06
KS			rk	18.5	0.0	1.50	0.0	20.00

(710) Broadband Price Offering
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	<d3></d3>		<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached {select}
	KS	All Exchanges	39.95	0.0	39.95	10.0	1.0	999999	Other, Other, DSL - "Value" (ADSL)
	KS	All Exchanges	59.95	0.0	59.95	10.0	1.0	999999	Other, Other, DSL - "Value" (ADSL) - Data Only
	KS	All Exchanges	69.99	0.0	69.99	20.0	1.0	999999	Other, Other, DSL - "Basic" (Bonded DSL)
	KS	All Exchanges	79.99	0.0	79.99	20.0	1.0	999999	Other, Other, DSL - "Basic" (Bonded DSL) - Data Only
	KS	All Exchanges	79.99	0.0	79.99	30.0	5.0	999999	Other, Other, DSL - "Essential" (VDSL)
	KS	All Exchanges	89.99	0.0	89.99	30.0	5.0	999999	Other, Other, DSL - "Essential" (VDSL) - Data Only
	KS	All Exchanges	89.99	0.0	89.99	50.0	10.0	999999	Other, Other, DSL - "Enhanced" (VDSL)
	KS	All Exchanges	99.99	0.0	99.99	50.0	10.0	999999	Other, Other, DSL - "Enhanced" (VDSL) - Data Only
	KS	All Exchanges	199.99	0.0	199.99	80.0	20.0	999999	Other, Other, DSL - "Premium" (VDSL)
	KS	All Exchanges	209.99	0.0	209.99	80.0	20.0	999999	Other, Other, DSL - "Premium" (VDSL) - Data Only
	KS	Ulysses	39.95	0.0	39.95	10.0	1.0	999999	Other, Other, FTTP "Value" - Asynchronous
	KS	Ulysses	49.95	0.0	49.95	10.0	1.0	999999	Other, Other, FTTP "Value" - Asynchronous - Data Only
	KS	Ulysses	69.99	0.0	69.99	25.0	5.0	999999	Other, Other, FTTP "Basic" - Asynchronous
	KS	Ulysses	79.99	0.0	79.99	25.0	5.0	999999	Other, Other, FTTP "Basic" - Asynchronous - Data Only
	KS	Ulysses	89.99	0.0	89.99	50.0	10.0	999999	Other, Other, FTTP "Enhanced" - Asynchronous
	KS	Ulysses	99.99	0.0	99.99	50.0	10.0	999999	Other, Other, FTTP "Enhanced" - Asynchronous - Data Only
	KS	Ulysses	99.99	0.0	99.99	25.0	25.0	999999	Other, Other, FTTP "Business Basic" - Synchronous
	KS	Ulysses	109.99	0.0	109.99	25.0	25.0	999999	Other, Other,FTTP "Bus Basic"- Synch Data Only
	KS	Ulysses	199.99	0.0	199.99	50.0	50.0	999999	Other, Other, FTTP "Business Enhanced" - Synchronous
	KS	Ulysses	209.99	0.0	209.99	50.0	50.0	999999	Other, Other, FTTP "Bus Enhan"-Asynch Data Only
	KS	Hugoton	39.95	0.0	39.95	10.0	1.0	999999	Other, Other, FTTP "Value" - Asynchronous

(710) Broadband Price Offerings	
Data Collection Form	

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	411817
<015>	Study Area Name	PIONEER TEL ASSN INC
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	catherine.moyer@pioncomm.net

<711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<c> <d1></d1></c>	<d2></d2>	<d3></d3>		<d4></d4>
	State	Exchange (ILEC)	Residential	State Regulated	Total Rates		Broadband Service	Usage Allowance	Usage Allowance Action Taken
	5.0.0		Rate	Fees	and Fees	Download Speed (Mbps)	-Upload Speed (Mbps)	(GB)	When Limit Reached (select)
	KS	Hugoton	49.95	0.0	49.95	10.0	1.0	999999	Other, Other, FTTP "Value" - Asynchronous - Data Only
	KS	Hugoton	69.99	0.0	69.99	25.0	5.0	999999	Other, Other, FTTP "Basic" - Asunchronous
	KS	Hugoton	79.99	0.0	79.99	25.0	5.0	999999	Other, Other, FTTP "Basic" - Asunchronous - Data Only Other, Other, FTTP "Enhanced" -
	KS	Hugoton	89.99	0.0	89.99	50.0	10.0	999999	Other, Other, FTTP "Enhanced" - Asynchronous
	KS	Hugoton	99.99	0.0	99.99	50.0	10.0	999999	Other, Other, FTTP "Enhanced" - Asynchronous - Data Only
	KS	Hugoton	99.99	0.0	99.99	25.0	25.0	999999	Other, Other, FTTP "Business Basic" - Synchronous
	KS	Hugoton	109.99	0.0	109.99	25.0	25.0	999999	Synchronous Other, Other, FTTP "Bus Basic"-Synch Data Only
	KS	Hugoton	199.99	0.0	199.99	50.0	50.0	999999	Other, Other, FTTP "Business Enhanced" - Synchronous
	KS	Hugoton	209.99	0.0	209.99	50.0	50.0	999999	Other, Other, FTTP "Bus Enhan" - Synch- Data Only

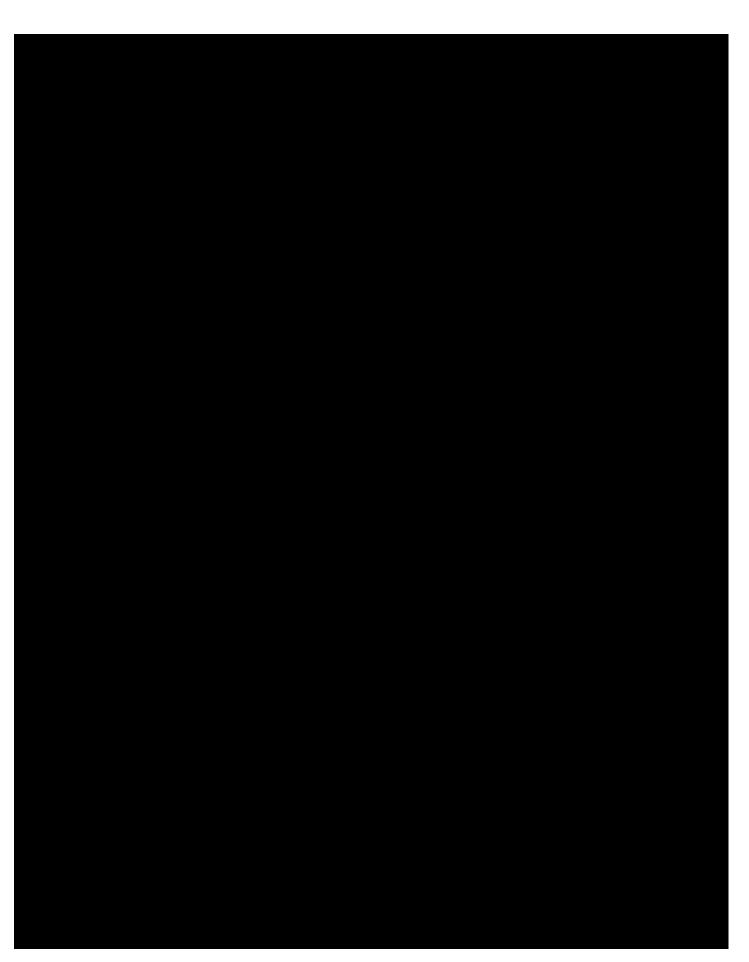
(800) Operating Companies	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code		411817
<015>	Study Area Name		PIONEER TEL ASSN INC
<020>	Program Year		2017
<030>	Contact Name - Person USAC should contact regarding this data		Catherine Moyer
<035>	Contact Telephone Number - Number of person identified in data line <030>		6203563211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>		catherine.moyer@pioncomm.net
<810>	Reporting Carrier	Pioneer Telephone Association, Inc.	
<811>	Holding Company	Pioneer Telephone Association, Inc.	
<812>	Operating Company	Pioneer Telephone Association, Inc.	

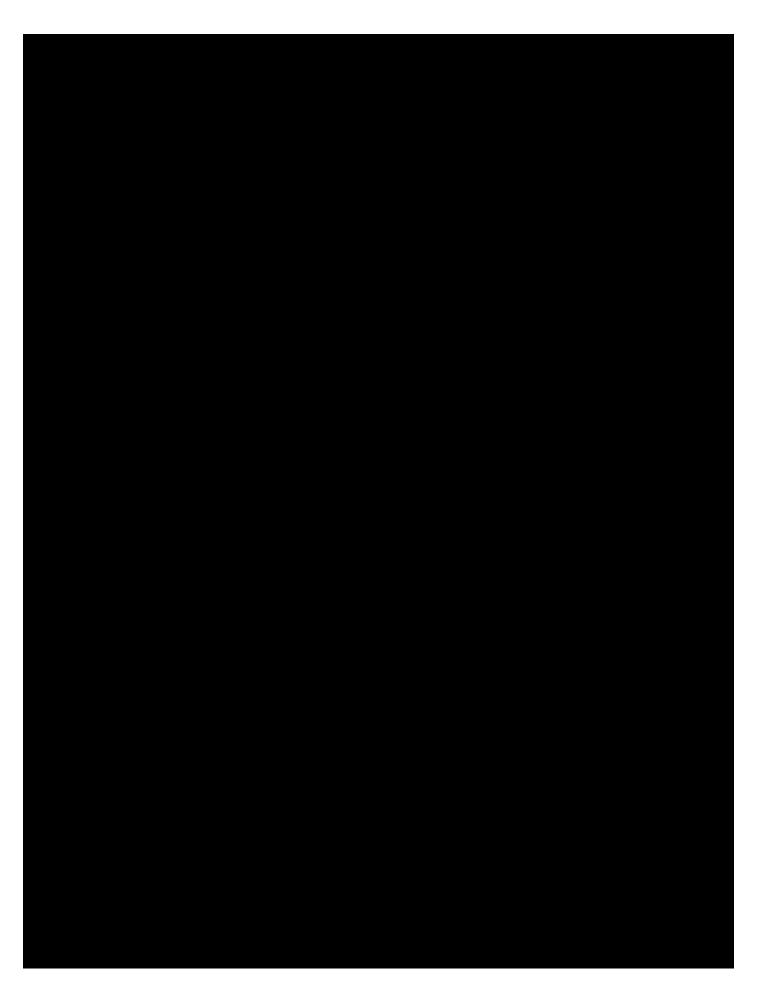
<813>	<a1></a1>	<a2></a2>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	HIGH PLAINS TELECOMMUNICATIONS, INC.		PIONEER LONG DISTANCE
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# PIONEER TELEPHONE ASSOCIATION, INC. FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN (USAC DOCUMENT - 411817KS112.PDF)

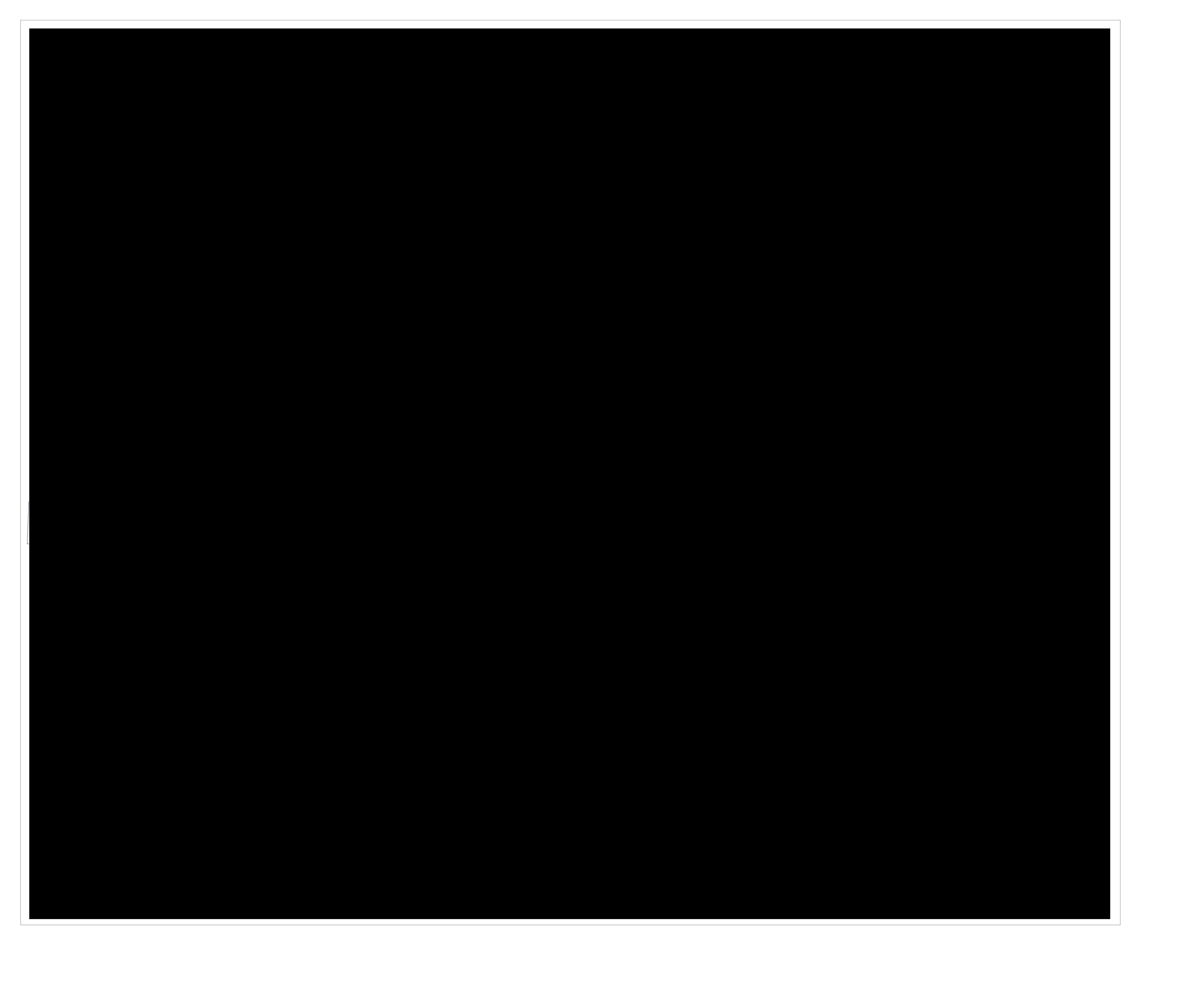




**REDACTED - FOR PUBLIC INSPECTION** 







# PIONEER TELEPHONE ASSOCIATION, INC. QUALITY OF SERVICE AND CUSTOMER PROTECTION PROCESS (USAC DOCUMENT - 411817KS510.PDF)

## THE PIONEER TELEPHONE ASSOCIATION, INC. d/b/a

### PIONEER COMMUNICATIONS OUALITY OF SERVICE & CUSTOMER PROTECTION PROCESSES

#### 1. Available Customer Service Representatives to Assist Customers

All calls received by Pioneer Communication during business hours (8:00am to 5:00pm), are answered by a phone receptionist and transferred to an available customer service representative. Customer service representatives assist customers during this time. When the assigned customer service representatives are unable to answer calls, additional customer service help desk representatives are available to help answer phones.

#### 2. Provide a 24/7 Hour Customer Service Help Desk

All calls are answered. Customer service help desk representatives assist customers from 12:00am to 11:59pm each day, except for Thanksgiving and Christmas. Issues, such as outages, requiring immediate attention are sent to the Pioneer Communications service technician on call, who works to resolve the matter as quickly as possible. If that technician is unable to resolve the problem, additional technicians are called. Unresolved issues are reviewed the following work day. Call logs are reviewed daily by personnel.

#### 3. Online Bill Payments

Payments made online are posted to the customer's account promptly and are viewable on the customer's account within 24 hours. Any problems are reported to the senior manager and resolved as quickly as possible.

#### 4. Customer Satisfaction Surveys to All Current Subscribers

Surveys with questions regarding the areas of services and Pioneer Communications personnel are made available to customers to rate the company. These surveys are distributed by phone calls and paper. Results are returned to the senior management team for interpretation and to allow proper follow-up to customer issues.

#### 5. Give Customers Cut-off Warnings & Provide Bill Arrangement Opportunities

Customers receive their monthly bill on or before the 1<sup>st</sup> of each month. The bill is due on the 15<sup>th</sup> of the month. If the bill goes unpaid, a late notice is sent on the 16<sup>th</sup> with a second due date of eleven days after the 15<sup>th</sup> (due on the 26<sup>th</sup>) and are instructed to pay by that date to avoid suspension. We will suspend a customer for non-payment on the 4<sup>th</sup> of the following month. If the 4<sup>th</sup> falls on a Friday or holiday, the suspension occurs the next business day. (Customers in danger of being suspended also receive a phone call from the customer service representatives before the 4<sup>th</sup>.) Customers with extenuating circumstances are allowed to arrange bill payment plans over a period of time to avoid being suspended.

#### 6. Ensure That All New Service Installation Orders Are Fulfilled Promptly

At the time of install, a customer is given information about when the installation will occur, depending on the current installation schedule. If outside plant is already in place, the installation is completed customers' earliest convenience; if outside plant is in not in place, the installation is completed once the plant has been built.

#### 7. Minimize Customer Downtime for Services

All trouble reports are handled the same day the report is received, including after normal working hours and on the weekend.

#### 8. Proactively Monitoring in Case of Major Service Outages

Service technicians will be made aware of outages affecting customers within thirty minutes. It is the goal of Pioneer Communications to resolve major outages in four hours or less. If an outage has not been resolved within four hours, technicians will begin utilizing all resources, both from within and from outside.

#### **CUSTOMER PRIVACY**

Company Confidential Information Policy – Pioneer Communications has a company policy in place that holds employees accountable for a breach of confidentiality concerning customer data and company information. Employees are reminded that revealing any type of confidential information to unauthorized persons or tampering with or altering company records and/or property is a violation of trust that can result in disciplinary action up to and including discharge."

#### Company CPNI Policy

Pioneer Communications has a Customer Proprietary Network Information (CPNI) policy in place that ensures employee compliance with the FCC's CPNI guidelines. Outlined within the policy is a detailed description of CPNI as well as both acceptable and unacceptable CPNI practices. Employees are required to sign waivers stating they understand and agree to comply with the policy and acknowledge that failure to protect this information result in disciplinary action up to and including discharge.

As a part of this policy, Pioneer Communications has designated a Compliance Officer responsible for training employees, monitoring CPNI related activities, and reporting breaches.

## PIONEER TELEPHONE ASSOCIATION, INC. EMERGENCY SITUATION FUNCTIONALITY – AVAILABILITY OF BACK UP POWER (USAC DOCUMENT - 411817KS610.PDF)

#### PIONEER TELEPHONE ASSOCIATION, INC EMERGENCY SITUATION FUNCTIONALITY

#### AVAILABILITY OF BACK-UP POWER

Pioneer Telephone Association, Inc. owns and operates fifteen central office locations within the boundaries of its serving area. Each central office contains a diesel, natural gas or propane generation system and an automatic transfer switch. These systems are capable of providing sufficient back-up power for rectifiers, lighting and HVAC for lengthy outages of commercial power. Each generation system is inspected and manually exercised monthly by Pioneer personnel. Pioneer also services the generators annually and makes minor system repairs. Major system repairs are completed by manufacturer-certified technicians.

Remote subscriber terminals contain back-up battery systems to maintain service during commercial power outages. The batteries and power systems are periodically maintained and tested by qualified technicians. During extended commercial power outages, portable AC generators are available for use at sensitive or high-traffic terminals.

For fiber-to-the-home (FTTH) services, Optical Network Terminations at the customer premises are paired with battery back-up systems that are designed to sustain landline service during commercial power outages. For extended power outages, batteries are available for delivery to critical locations. System and battery statuses are monitored by the manufacturer's network monitoring software.

#### TRAFFIC ROUTING

Voice traffic between Pioneer's host central office switch and remote central office switches is delivered across an OC-48 SONET ring. This network utilizes two-fiber Bidirectional Line Switched Ring (BLSR) technology to allow continued connectivity in the event of a transport failure.

Voice traffic between Pioneer's host central office switch and upstream tandem switch is also transported across the Pioneer SONET ring. At the handoff point, two redundant OC-12 connections are connected between Pioneer's transport node and the upstream carrier.

#### NETWORK CAPACITY

Voice trunks and switching components are periodically monitored by Pioneer to ensure channel availability. Upstream carriers connected to Pioneer's network also perform their own utilization testing. The upstream carriers will increase or reduce channel capacity as necessary.

PIONEER TELEPHONE ASSOCIATION, INC.

VOICE SERVICES RATE COMPARABILITY

(USAC DOCUMENT - 411817KS1010.PDF)

# Voice Services Rate Comparability THE PIONEER TELEPHONE ASSOCIATION, INC. d/b/a PIONEER COMMUNICATIONS

In compliance with the 54.313 Rules, The Pioneer Telephone Association, Inc. must certify that its current rate for fixed voice services is no more than two standard deviations above the national average urban rate for voice service.

According to the 2016 Urban Rate Survey conducted by the FCC's Wireline Competition Bureau, the rate floor for voice services is \$21.93, and the reasonable comparability benchmark for voice services is \$41.07<sup>1</sup>.

The rates shown on the Voice Pricing Form (0700) are below \$41.07. Consequently, The Pioneer Telephone Association, Inc. meets the above mentioned requirement.

<sup>&</sup>lt;sup>1</sup> WIRELINE COMPETITION BUREAU ANNOUNCES RESULTS OF 2016 URBAN RATE SURVEY FOR FIXED VOICE AND BROADBAND SERVICES, POSTING OF SURVEY DATA AND EXPLANATORY NOTES, AND REQUIRED MINIMUM USAGE ALLOWANCE FOR ETCS SUBJECT TO BROADBAND PUBLIC INTEREST OBLIGATIONS; WC Docket #10-90, DA 16-362 Released April 5<sup>th</sup>, 2016

# PIONEER TELEPHONE ASSOCIATION, INC. MILESTONE CERTIFICATION (USAC DOCUMENT - 411817KS3010.PDF)

#### Progress Report on 5 Year Plan Line 3010(b) - Milestone Certification

Pioneer Telephone Association, Inc. d/b/a Pioneer Communications certifies that, upon a reasonable request, it will provide Broadband services at actual speeds of 4Mbps downstream / 1Mbps upstream, with latency suitable for real-time applications, including VoIP and usage capacity that is reasonably comparable to urban areas and that requests for such services are met within a reasonable amount of time.

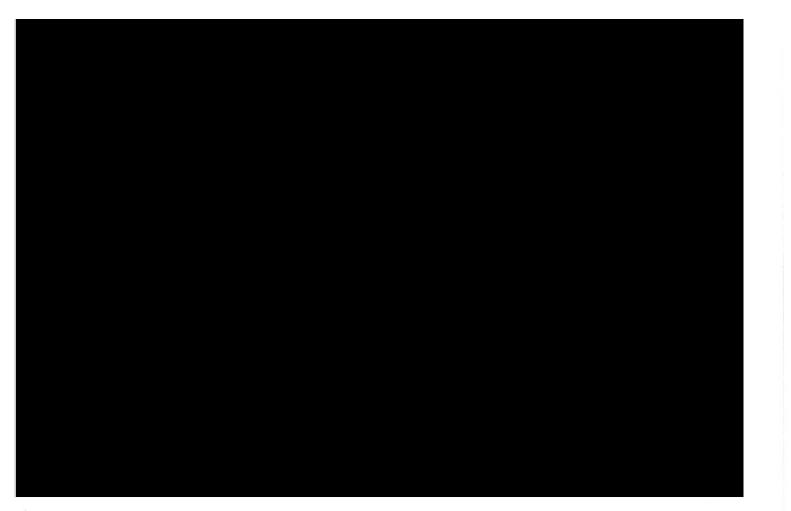
## PIONEER TELEPHONE ASSOCIATION, INC. FINANCIAL STATEMENTS

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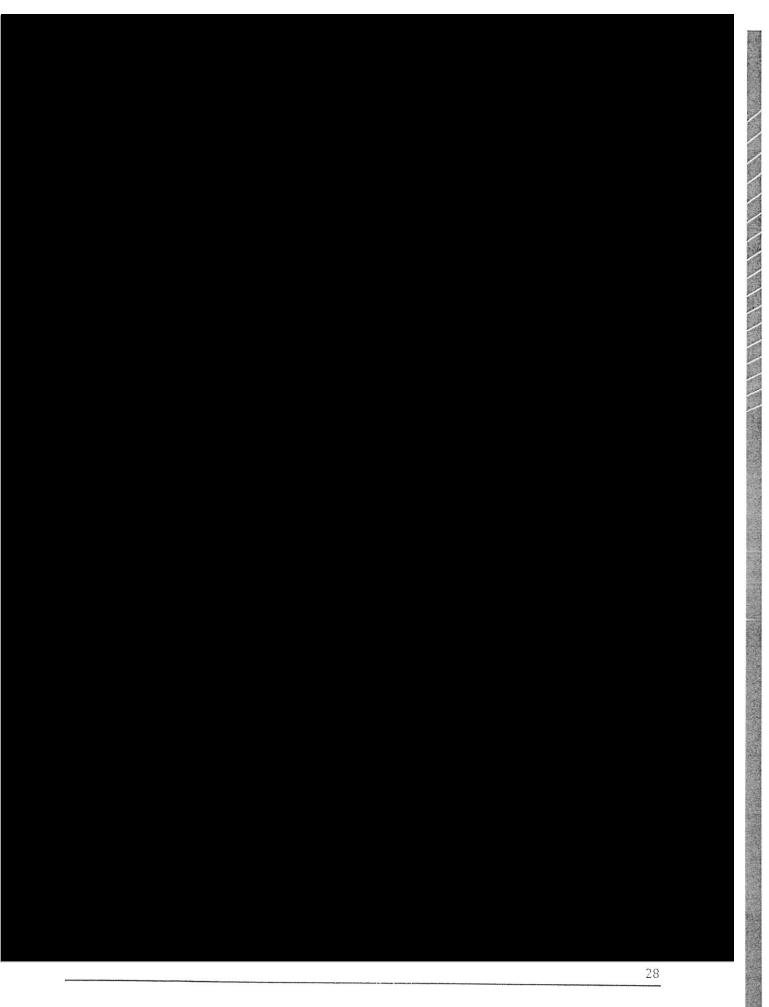
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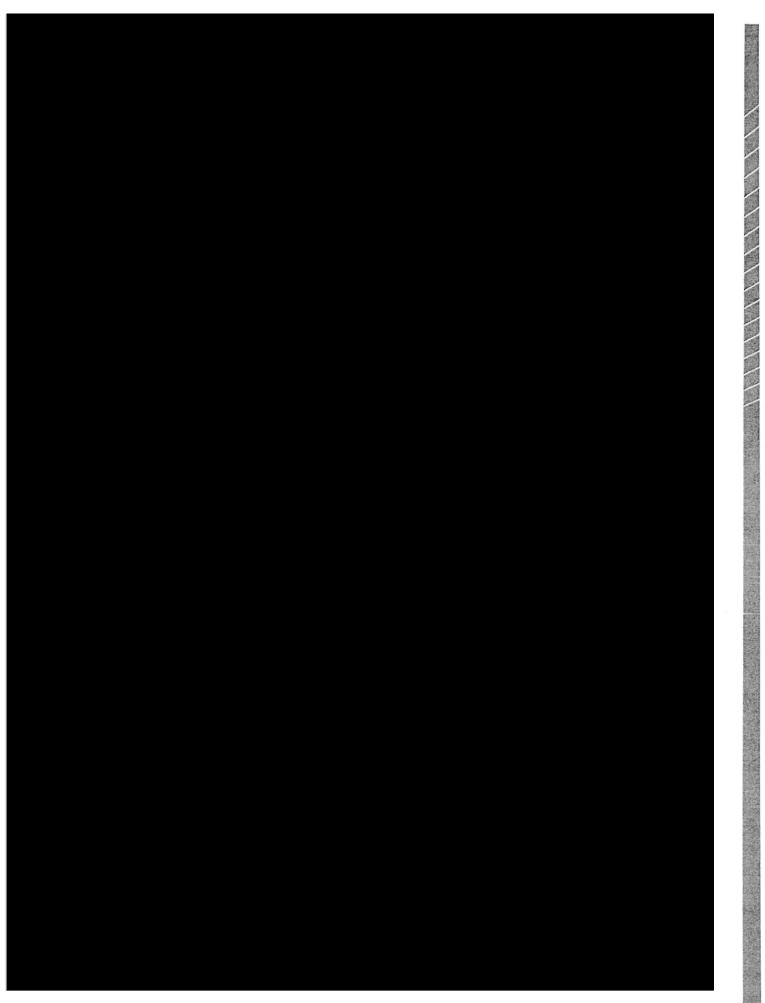
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